

Defendant's Supplemental Exhibit 69

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: FACEBOOK, INC., MDL No. 2843
CONSUMER USER PROFILE Case No.
LITIGATION 18-md-02843-VC-JSC

This document relates to:
ALL ACTIONS

HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY
ZOOM DEPOSITION OF FACEBOOK'S 30(b)(6)
CORPORATE REPRESENTATIVE - HARRISON FISK
(Reported Remotely via Video & Web Videoconference)
Menlo Park, California (Deponent's location)
Tuesday, August 16, 2022
Volume 1

STENOGRAPHICALLY REPORTED BY:
REBECCA L. ROMANO, RPR, CSR, CCR
California CSR No. 12546
Nevada CCR No. 827
Oregon CSR No. 20-0466
Washington CCR No. 3491
JOB NO. 5345585
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1 A. Yes, I worked on TAO very extensively. 09:18:12
2 Q. It says that you prepared for about
3 48 hours; is that right?
4 A. Yes.
5 Q. And 40 of those hours were with counsel, 09:18:26
6 correct?
7 A. Yes.
8 Q. About how many times did you meet with
9 counsel?
10 A. I don't know the specific number. Some 09:18:43
11 of them were in, like, larger blocks of time. So
12 we would meet for four hours at a time. I would --
13 if I had to make an estimate, I'd say probably
14 somewhere between a dozen or two dozen times.
15 Q. Were those in person? 09:19:02
16 A. No.
17 Q. Were those by video?
18 A. Yes.
19 Q. Do -- who did you meet with -- was it
20 counsel at Facebook? 09:19:17
21 A. So there was typically a number of
22 different counsels. So we had Heather, Martie, and
23 then our internal counsel, Ian, as well.
24 Q. Okay. And it says you spent eight hours
25 studying on your own; is that right? 09:19:35

1 A. Correct. 09:19:37

2 Q. What did you do to study on your own?

3 A. So this was primarily reviewing some of
4 the documents, such as the white papers, since they
5 were pretty extensive, understanding -- reading 09:19:47
6 through those, as well as reviewing some of the
7 prior case submissions to understand what's been
8 stated already.

9 Q. For those white papers identified by your
10 counsel ahead of this deposition? 09:20:10

11 A. They -- I believe these are the ones that
12 were negotiated and discussed beforehand. They did
13 identify them to me, but I believe they came via
14 negotiations with your couple as well.

15 Q. And then it says you met with -- and it 09:20:29
16 lists a couple people, and I'm going to ask you
17 some questions.

18 So first, it says you met with
19 Dez Udezue; is that right?

20 A. Yes. 09:20:43

21 Q. How long did you meet with him?

22 A. For 30 minutes.

23 Q. And what was that regarding?

24 A. So this was regarding the SRT system.

25 Q. And what specifically did you discuss 09:20:54

1 about the SRT system? 09:20:57

2 A. Primarily about how it pulls data. How

3 it's built to -- to confirm some of my beliefs.

4 Q. And what were your beliefs?

5 A. So the -- the -- places and the ways that 09:21:19

6 it actually pulled data matched the -- the ways

7 that I believed it would.

8 Q. Okay. We -- we can discuss SRT in a

9 little bit more detail later, and we'll revisit the

10 ways that it does pull data. 09:21:37

11 So it says you met as well with

12 Maxwell Dickey.

13 What was that about?

14 A. This is similar, but around Centra and

15 Switchboard. 09:21:50

16 Q. And was that for 30 minutes?

17 A. Yes.

18 Q. And it says you met with Adam Kramer; is

19 that right?

20 A. Yes. 09:22:03

21 Q. Was that regarding HQL?

22 A. Yes.

23 Q. And for 30 minutes?

24 A. Yes.

25 Q. And it says you met with Sara Galvin? 09:22:11

1 A. Yes. 09:22:16

2 Q. Regarding Switchboard for 30 minutes,

3 correct?

4 A. Correct.

5 Q. Is it fair to assume that all -- where it 09:22:23

6 says Hive or TAO for Mayur Patel, that's what you

7 discussed?

8 A. Yes.

9 Q. And that was for five hours?

10 A. Yes. 09:22:36

11 Q. For Zachary Prinzbach, you discussed

12 Centra, correct?

13 A. Yes.

14 Q. For 30 minutes?

15 A. Yes. 09:22:51

16 Q. I'm just going to assume that where it

17 says the subject after the name, that's -- that's

18 what you discussed for these people; is that fair?

19 A. Yes. Correct.

20 Q. And in parentheses, the number is 09:23:09

21 reflecting how much time you discussed for?

22 A. Yeah, the amount of hours.

23 Q. Okay. For Chaya Nayak, it says you

24 discussed research.

25 What -- what did you discuss about 09:23:25

1 research? 09:23:27

2 A. This was about understanding how the
3 research program works with regards to data.

4 Q. Did you discuss how data can be pulled
5 from Hive? 09:23:54

6 A. Yes. We discussed essentially the -- the
7 flow of data and the requirements in order to be
8 able to disclose it to research.

9 Q. What are some of the requirements?

10 A. One of the -- the primary ones is we do 09:24:11
11 not disclose any sort of user specific identifying
12 data. We only disclose aggregated data that's also
13 gone through various privacy enhancing techniques.

14 Q. How do you make sure that those
15 requirements are met? 09:24:35

16 A. So there's various audits as well as
17 analysis done in order to ensure prior to any sort
18 of disclosure.

19 Q. Okay. This is another one we may return
20 to later. 09:24:51

21 By Kyle Minshall, it says you discussed
22 APIs; is that right?

23 A. Correct.

24 Q. What did you discuss about APIs?

25 A. There was a question put forward 09:25:06